

As Chairperson of the Calleguas Creek Watershed Management Plan Steering Committee, I want to thank you for the opportunity to provide comments on the Integrated Regional Water Management Program (IRWM) Draft Guidelines. Two of our staff, Rick Alexander (Program Facilitator) and Tony Lettieri (Program Manager), attended the August 31, 2004 meeting in Ontario. They provided a report to the project Steering Committee, with a set of comments and recommendations. That report was reviewed by three of our subcommittees (Water Quality/Water Resources, Flood Control and Sediment Management, and Agriculture) and a set of final comments and recommendations were drafted. Overall, we believe that the Draft Guidelines are well written and comprehensive. They appear to respond to the intent of Proposition 50 and they provide clear direction to potential applicants. Our comments are offered to assist in those areas where additional clarification is needed in matters of interpretation.

On September 15, 2004, the Calleguas Creek Watershed Management Plan Steering Committee approved these comments:

Issues and Comments to DWR and SWRCB

1. *Definition of Regional*- The guidelines discuss the need for a regional approach that demonstrates and integrated and comprehensive approach. During the public meeting there were a number of questions about the definition of regional.

Recommendation: That the final guidelines and criteria specifically identify that watersheds and watershed management planning are examples of a region and a regional approach for the purposes of this section.

2. *What Constitutes Adoption* -For both Planning and Implementation Grants, the applicant must show that the IRWM Plan has been adopted by the required agency. It is currently unclear if this means that Steering Committee adoption is acceptable and/or if additional individual agency actions are required.

Recommendation: Add language that states the following: Adoption must be obtained from the governing body of a Stakeholder driven process (such as a Steering Committee) if Memorandum of Agreements have been executed supporting the process and by the Boards of at least three agencies, two of which have statutory authority over water.

3. *Need to Complete the CEQA Process* -Activities funded by Proposition 50 must be in compliance with CEQA. At the public meeting it was stated by DWR staff that this means that a grant may be awarded for a project that has not completed the CEQA process, but the money will not be disbursed until the environmental certification is completed.

Recommendation: It is not unusual in a plan to identify projects that need additional CEQA review. Since CEQA review can be costly, costs for CEQA certification should be reimbursable through Proposition 50. Further, clarification should be made that projects that have not completed the CEQA process will still be eligible and will not lose points in the competitive review process.

4. *Recognition of Stakeholder Process:* At the public meeting, a comment was made that DWR and SRWQCB need to recognize that stakeholder driven processes are very complex and involve different parties getting together and deciding on a set of priorities that involve compromise in the spirit of overall cooperation.

Recommendation -When a grant application is submitted, DWR and SRWQCB should recognize that fact and be careful not to delete projects that have been worked out by these diverse coalitions. If there is a desire to do so by DWR and SRWQCB, consultation with the governing board of the stakeholder process should occur first.